



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 1, 2022

BY ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. James Bradley and Arwa Muthana*, 21 Cr. 277 (PAE)

Dear Judge Engelmayer:

The Government writes to respectfully update the Court regarding the Government's cross-production of materials related to its inquiry as to statements made by the defendants to U.S. government personnel while housed in Bureau of Prisons ("BOP") custody. Pursuant to the defendants' request, the Government has, as of July 1, 2022, cross-produced notes and records of those statements to respective counsel for the defendants.

The Government's position remains that, in an abundance of caution, the prosecution team will not access or view the notes and records, nor discuss the substance of those records, with the undersigned or BOP staff members with knowledge of their contents. The undersigned will continue to perform a wall-attorney function and address any questions or concerns defense counsel may have with respect to these materials, including any issues that may arise if defense counsel intends to use the materials affirmatively. The undersigned is of course available to appear before the Court should it have any further questions regarding the materials and events discussed herein.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

The Court appreciates this notification and
does not perceive a need for court action
as to this issue.

7/5/2022

SO ORDERED.

By: _____/s/
Matthew Hellman
Assistant United States Attorney
(212) 637-2278

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge